

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF NORTH)	CASE NO.
MCLEAN COUNTY WATER DISTRICT FOR AN)	2020-00238
ALTERNATIVE RATE ADJUSTMENT)	

NOTICE OF FILING OF COMMISSION STAFF REPORT

Notice is hereby given that, in accordance with the Commission's Orders of August 20, 2020, the attached report containing the findings of Commission Staff regarding the Applicant's proposed rate adjustment has been filed in the record of the above-styled proceeding. Pursuant to the Commission's August 20, 2020 Order, North McLean County Water District is required to file written comments regarding the findings of Staff no later than 14 days from the date of this report. Pursuant to the Commission's Orders in Case No. 2020-00085,¹ issued March 16, 2020, and March 24, 2020, North McLean County Water District SHALL NOT FILE the original paper copy at this time, but rather shall file original paper copy within 30 days of the lifting of the current state of emergency. Due to COVID-19, Commission Staff is unable to physically sign this report. When Commission Staff is able to sign this report, a notice of filing with the executed signature page will be made in this case docket.

¹ Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 16, 2020), Order at 5–6. Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC Mar. 24, 2020), Order at 1–3.



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P.O. Box 615
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DATED NOV 17 2020

cc: Parties of Record

Case No. 2020-00238

STAFF REPORT
ON
NORTH MCLEAN COUNTY WATER DISTRICT
CASE NO. 2020-00238

North McLean County Water District (North McLean District) is a water utility organized pursuant to KRS Chapter 74 that owns and operates a water distribution system through which it provides retail water service to approximately 1,307 retail customers, and three wholesale customers, that reside in McLean County, Kentucky.¹ On August 04, 2020, North McLean District tendered an application to the Commission requesting to adjust its water rates pursuant to 807 KAR 5:076, and it was determined to be deficient. The deficiency was cured on August 12, 2020, and considered filed. To ensure the orderly review of the application, the Commission established a procedural schedule by Order dated August 20, 2020. Commission Staff (Staff) issued two rounds of formal discovery.

To comply with the requirements of 807 KAR 5:076, Section 9,² North McLean District used the calendar year ended December 31, 2019, as the basis for its application.

Using its pro forma test-year operations, North McLean District determined that a revenue increase of \$94,236, or 12.36 percent, over test-year normalized revenues of \$762,288 is warranted as shown in the table below.³ The rates requested by North

¹ *Annual Report of North McLean County District to the Public Service Commission for the Calendar Year Ended December 31, 2019* at 12 and 49.

² The reasonableness of the proposed rates shall be determined using a 12-month historical test period, adjusted for known and measureable changes, that coincides with the reporting period of the applicant's annual report for the immediate past year.

³ Application, Attachment 5.

McLean District would increase the residential monthly bill of a typical residential customer using 4,000 gallons per month by \$3.91, from \$31.84 to \$35.75, or approximately 12.28 percent.⁴

<u>Revenue Requirement Determination- Operating Ratio Method</u>	
Pro Forma Operating Expenses Before Income Taxes	\$ 784,387
Divided by: Operating Ratio	<u>0.88</u>
 Sub-Total	 891,349
Less: Pro Forma Operating Expenses Before Income Taxes	<u>(784,387)</u>
 Net Income Allowable	 106,962
Add: Interest Expense	2,126
Pro Forma Operating Expenses Before Taxes	<u>784,387</u>
 Total Revenue Requirement	 893,475
Less: Other Operating Revenue	(30,244)
Non-operating Revenue	0
Interest Income	<u>(6,707)</u>
 Total Revenue Required from Rates for Service	 856,524
Less: Revenue from Sales at Present Rates	<u>(762,288)</u>
 Required Revenue Increase	 <u>\$ 94,236</u>
Percentage Increase	<u>12.36%</u>

To determine the reasonableness of the rates requested by North McLean District, Staff performed a limited financial review of North McLean District's test-year operations. The scope of Staff's review was limited to determining whether operations reported for the test year were representative of normal operations. Known and measurable changes to test-year operations were identified and adjustments were made when their effects were deemed to be material. Insignificant and immaterial discrepancies were not necessarily pursued or addressed.

⁴ Application, Attachment 1.

Staff's findings are summarized in this report. William Foley reviewed the calculation of North McLean District's Overall Revenue Requirement. Jason Green reviewed North McLean District's reported revenues and rate design.

SUMMARY OF FINDINGS

1. Overall Revenue Requirement and Required Revenue Increase. By applying the Operating Ratio Method, as generally accepted by the Commission, Staff found that North McLean District's Overall Revenue Requirement is \$856,524 and that a \$94,236 revenue increase, or 12.93 percent, to pro forma present rate revenues is necessary to generate the Overall Revenue Requirement.

2. Water Service Rates. In the application, North McLean District proposed to increase all of its monthly water service rates evenly across the board by approximately 12.36 percent. The Commission has previously found that the allocation of a revenue increase evenly across the board to a utility's current rate design is appropriate and equitable method of cost allocation in the absence of a cost of service study. Finding no evidence of a cost of service study having been performed in this case, Staff followed the method proposed by North McLean District and allocated the \$117,761 revenue increase Staff found warranted evenly across the board to North McLean District's current monthly water service rates. Shown in the Attachment to this report are the monthly water service rates as calculated by Staff. These rates would increase a typical residential customer's monthly bill from \$34.28 to \$39.11, an increase of \$4.83, or approximately 14.09 percent.

3. Non-Recurring Revenues. During the test year, North McLean District earned \$21,091 in non-recurring charges. North McLean District provided a detailed breakdown of the charges as shown in the table below.

<u>Non Recurring Revenue Sources</u>	<u>Amount</u>
Reconnect Charges	\$4,140
Penalty	<u>16,951</u>
Total	<u>\$21,091</u>

PRO FORMA OPERATING STATEMENT

North McLean District's Pro Forma Operating Statement for the test year ended December 31, 2019, as determined by Staff, appears below.

	Test Year	Adjustment	(Ref.)	Pro Forma
Operating Revenues				
Sales of Water				
Metered Water Sales	\$ 762,288	7,106 (A)		
		66,993 (B)		\$ 836,387
Other Water Revenues				
Total Other Water Revenues	<u>30,244</u>	<u>(8,145) (C)</u>		<u>22,099</u>
Total Operating Revenues	<u>\$ 792,532</u>	<u>65,954</u>		<u>\$ 858,486</u>
Operating Expenses				
Operation and Maintenance Expenses				
Salaries and Wages - Employees	219,807	400 (D)		
		12,193 (E)		232,400
Salaries and Wages - Officers	16,200	(400) (F)		15,800
Employee Pensions and Benefits	9,179			9,179
Purchased Water	333,674	66,254 (G)		
		648 (H)		400,576
Purchased Power	10,587	17 (H)		10,604
Materials and Supplies	39,291			39,291
Contractual Services	14,566			14,566
Rents	2,040			2,040
Transportation Expenses	14,584			14,584
Insurance	13,385			13,385
Miscellaneous Expense	<u>19,122</u>			<u>19,122</u>
Total Operation and Maintenance Expenses	692,435	79,111		771,546
Depreciation	71,067	376 (I)		71,443
Taxes Other Than Income	<u>20,885</u>	<u>933 (J)</u>		<u>21,818</u>
Utility Operating Expenses	<u>784,387</u>	<u>80,421</u>		<u>864,807</u>
Net Operating Income	8,145	(14,467)		(6,322)
Gain on Disposition of Property	(243)	243 (K)		-
Utility Operating Income	<u>\$ 7,902</u>	<u>\$ (14,224)</u>		<u>\$ (6,322)</u>

(A) Billing Analysis Adjustment. North McLean District provided a billing analysis in the application that contained significant errors and was not an accurate representation of revenues generated from water sales. North McLean District filed a corrected billing analysis on August 12, 2020, that was determined to be an accurate representation of revenues from water sales for the test period. The normalized test-period revenue from water sales of \$769,394 was applied and an adjustment of \$7,106 was made.

(B) Purchase Water Adjustment. Subsequent to the test year, the Commission, pursuant to 807 KAR 5:068, authorized North McLean District to increase its water rates in order to pass through the wholesale water rate increase of its supplier.⁵ By applying the current retail rates authorized by the Commission to the applicable water sales shown in the billing analysis provided by North McLean District's application, Staff determined that pro forma present-rate revenues from retail sales should be stated at \$836,387 and an adjustment of \$66,993 was made.

(C) Non-Recurring Charges. Following the Commission's recent decision set out in the final Order issued in Case No. 2020-00141, Hyden-Leslie County Water District's recent Alternative Rate Filing,⁶ Staff has reviewed North McLean District's non-recurring charges. In Case No. 2020-00141, the Commission found that since personnel are paid during normal business hours regardless of whether they are on a field visit or not, labor costs included in non-recurring charges that occur during regular business

⁵ Case No. 2020-00320, *Electronic Purchased Water Adjustment Filing of North McLean Water District* (Ky. PSC Oct. 21, 2020).

⁶ Case No. 2020-00141, *Electronic Application of Hyden-Leslie County Water District for an Alternative Rate Adjustment* (Ky. PSC Nov. 6, 2020)

hours should be eliminated. Staff has reviewed the most recent non-recurring cost justification⁷ and has adjusted charges by removing field labor costs and office/clerical labor costs from the charges. For non-recurring charges that occur after normal business hours, following Case No. 2020-00141, Staff removed the office/clerical labor costs. Additionally, Staff adjusted the mileage rate to the current allowable by the Internal Revenue Service (IRS) of \$0.575 per mile.⁸ Such adjustments result in the following revised non-recurring charges:

<u>Non-Recurring Charge</u>	<u>Normal Hours</u>	<u>After Hours</u>
Service Call	\$8.64	\$48.42
Disconnect Fee	\$17.25	\$54.06
Reconnect Fee	\$17.25	\$54.06
Cut-Lock Charge	\$48.63	\$48.63

The adjustments result in a net decrease to non-recurring charges and a corresponding increase to the revenue requirement of \$25,097 as shown below.

<u>Non-Recurring Charges</u>			
<u>Charges</u>	<u>Utility</u>	<u>Adjustment</u>	<u>Staff</u>
	<u>Pro Forma</u>		<u>Pro Forma</u>
2019 Reconnection Normal Hours	\$ 5,880	\$ (3,982)	\$ 1,898
2019 Reconnection After hours	143	(35)	108
Meter Test	18	-	18
Cut-lock	96	(47)	49
Service charge	6,163	(4,081)	2,082
Totals	\$ 12,300	\$ (8,145)	\$ 4,155

⁷ TFS2019-00366 (Ky. PSC filed June 28, 2019); the tariff was accepted for filing by the Commission by letter dated July 31, 2019.

⁸ <https://www.irs.gov/tax-professionals/standard-mileage-rates>

(D) Salaries and Wages - Employees. In its application, North McLean District reported Salaries and Wages - Employees expense of \$219,807.⁹ Staff agrees with the methodology used by North McLean District, but disagrees with the amount North McLean District calculated for salaries and wages. Using wage and hour information provided by North McLean District's accountant in an email, Staff calculated a total salaries and wages result of \$220,207 as shown below. Therefore, Staff increased the salaries and wages account by \$400.

Job Title	Total Hours	Test Year Normal Hours	Pro Forma Wages Rate	Pro Forma Normal Wages	Test Year Overtime Hours	Pro Forma Overtime Wage Rate	Pro Forma Overtime Wages	Total Pro Forma Wages
Maintenance worker	2,569	2,088	\$ 19.87	\$ 41,489	481	\$ 29.81	\$ 14,324	\$ 55,812
Maintenance Superintendent	2,484	2,087	24.54	51,215	397	36.81	14,614	65,829
Secretary	2,113	2,089	23.02	48,089	24	34.53	829	48,918
Secretary	2,089	2,089	18.50	38,647	-	27.75	-	38,647
Mower	172	172	12.00	2,064	-	18.00	-	2,064
				181,503			29,766	211,269
							IRA Contributions	14,875
							Total Pro Forma Wages	226,144
							Less: Adjusting Entries	(5,937)
							Pro Forma Adjustment	220,207
							Test Year Salaries and waged	219,807
							Salaries and Wages adjustment	\$ 400

(E) Salaries and Wages. North McLean District provided all employees but one with a 3 percent increase to wages at the beginning of 2020, the remaining employee received a 6 percent increase to wages.¹⁰ However, in its review, Staff discovered that a

⁹ Application, Attachment 4.

<u>2019 Wages</u>	<u>2020 Wages</u>	<u>% increase</u>
\$19.87	\$20.47	3%
24.54	25.28	3%
23.02	24.39	6%
18.50	19.06	3%

part-time employee left the utility and was not replaced and therefore, should be removed from pro forma operations, as North McLean District could not confirm a rehire date. Staff then normalized salaries and wages expense using test-year hours worked and current pay rates shown below. Accordingly, Staff increased pro forma salaries and wages expense by \$12,193.

Job Title	Total Hours	Test Year Normal Hours	2020 Wages Rates	Pro Forma Normal Wages	Test Year Overtime Hours	2020 Overtime Wage Rates	Pro Forma Overtime Wages	Total Pro Forma Wages
Maintenance worker	2,569	2,088	\$ 20.47	\$ 42,741.36	481	\$ 30.71	\$ 14,769.11	\$ 57,510
Maintenance Superintendent	2,484	2,087	25.28	52,759.36	397	37.92	15,054.24	67,814
Secretary	2,113	2,089	24.39	50,950.71	24	36.59	878.04	51,829
Secretary	2,089	2,089	19.06	39,816.34	-	28.59	-	39,816
				<u>\$ 186,267.77</u>			<u>\$ 30,701.39</u>	<u>\$ 216,969</u>
							IRA Contributions	\$ 15,431
							Total Pro Forma Wages	232,400
							Less: Test Year Wages w/ adjustment	<u>220,207</u>
							Pro Forma Adjustment	<u>\$ 12,193</u>

(F) Salaries and Wages - Officers. North McLean District reported test-year salaries for commissioners of \$16,200.¹¹ However, North McLean miscalculated the total, as shown on the table below; the total for commissioners' salaries for the test year is \$15,800. Therefore, Staff reduced Salaries and Wages – Officers by \$400, and increased Salaries and Wages - Employees by \$400.

¹¹ Application, Attachment 4.

<u>Commissioners</u>	<u>Test Year Salaries</u>
Carrol Troutman	\$ 2,700
Dale Chandler	2,700
Gary Floyd	2,700
Keith Ayer	5,000
Russell Bell	<u>2,700</u>
 Total	 \$ 15,800
Test Year Salaries	<u>16,200</u>
 Adjustment	 <u>\$ (400)</u>

(G) Purchased Water. In its application, North McLean District reported purchased water expense of \$333,674.¹² North McLean District responded to Staff's initial data request with a breakdown of the gallons purchased from its different vendors.¹³ However, since the test year North McLean District received notice that their wholesale water suppliers increased the cost of water for North McLean District.¹⁴ The new rates increase future water purchases expense for North McLean District, Staff therefore recalculated the amount of water purchased from North McLean's suppliers with the current purchased rate. This resulted in a purchased water expense of \$399,928. Therefore, as shown below Staff calculated an increase of \$66,254 to Purchased Water Expense.

¹² *Id.*

¹³ Initial Responses from North McLean (filed Aug. 27, 2020), Item 5.

¹⁴ Case No. 2020-00320, *Purchased Water Adjustment Filing of North McLean Water District* (Ky. PSC Oct. 14, 2020).

Period	Purchased Water				
	McLean Co. Regional		West Daviess		Total
	Purchased	Dollars	Purchased	Dollars	
Jan-2019	9,560	\$ 3.22	322	\$ 3.85	\$ 32,023
Feb-2019	8,936	3.22	214	3.85	29,598
Mar-2019	8,984	3.22	209	3.85	29,733
Apr-2019	8,957	3.22	374	3.85	30,281
May-2019	10,758	3.22	367	3.85	36,054
Jun-2019	10,196	3.22	543	3.85	34,922
Jul-2019	11,353	3.22	189	3.85	37,284
Aug-2019	11,506	3.22	643	3.85	39,525
Sep-2019	11,120	3.22	243	3.85	36,742
Oct-2019	9,916	3.22	524	3.85	33,947
Nov-2019	8,983	3.22	271	3.85	29,969
Dec-2019	8,914	3.22	298	3.85	29,850
Purchased Water Expense					\$ 399,928
Test Year Purchased Water					<u>333,674</u>
Adjustment					<u>\$ 66,254</u>

(H) Excess Water Loss. Commission regulation 807 KAR 5:066, Section 6(3), limits water loss to 15 percent, for ratemaking purposes unless the Commission finds an alternative level reasonable. In the below table, Staff determined North McLean District's test-year water loss was 15.1621 percent, or .1621 percent above the 15 percent allowable limit.¹⁵

With the adjustments in the table below, Staff is removing from North McLean District's test-year operations the cost of purchasing the excess water loss. Therefore, Staff reduces Purchased Water by \$541 and Purchased Power by \$17 with a net adjustment of \$558.

¹⁵ *Annual Report of North McLean County District to the Public Service Commission for the Calendar Year Ended December 31, 2019* at 57.

	Purchased Water	Purchase Power
Purchased Water from 2019 Annual Report	\$ 333,674	\$ 10,587
Times: Water loss Above 15 Percent	-0.1621%	-0.1621%
Excess Water Loss Reductions	\$ (541.00)	\$ (17.00)

(l) Depreciation Expense. In the application, North McLean District reported its depreciation expense as \$71,067.¹⁶ To evaluate the reasonableness of the depreciation practices of small water utilities, the Commission has historically relied upon the report published in 1979 by the National Association of Regulatory Utility Commissioners (NARUC) titled Depreciation Practices for Small Water Utilities (NARUC Study). When no evidence exists to support a specific life that is outside the NARUC ranges, the Commission has historically used the midpoint of the NARUC ranges to depreciate the utility plant. Upon examination, Staff found that the appropriate adjustment would reduce test-year depreciation by \$376 as shown in the table below. Therefore, Staff reduced Depreciation Expense by \$376.

¹⁶ Application, Attachment 4.

Asset Category	Current:		Life	Pro Forma:	
	Original Cost	Depreciation Expense		Depreciation Expense	Difference
Electric Pumping Equip	\$ 90,780	\$ 2,270	20.0	\$ 4,539	\$ 2,270
Hydrants	34,402	673	40-60	673	-
Meter Install/Road Bores	34,573	845	40-50	775	(70)
Meters	249,429	9,852	35-45	6,236	(3,616)
Misc. Equipment	5,754	668	15-20	329	(339)
Office Equipment	6,098	578	20-25	243	(335)
Power Operated Equipment	12,972	745	10-15	910	165
Structures & Improvements	447,542	8,058	35-40	8,192	134
Tanks	222,286	5,818	30-60	4,940	(878)
Tools/Shop/Garage Equip	1,863	82	15-20	82	-
Transmission Mains	2,346,834	36,596	50-75	37,549	953
Transportation Equipment	48,825	4,883	7	6,975	2,093
				Pro Forma Depreciation Expense	71,443
				Test Year Depreciation Expense	71,067
				Pro Forma Adjustment	\$ 376

(J) Taxes Other Than Income, FICA. As discussed in Item (E), Staff increased North McLean District's Salaries and Wages - Employees account by \$12,193. Staff has adjusted FICA to reflect pro forma salaries and wages recommended herein. As shown below, Staff determined that test-year FICA taxes should be increased by \$1,091 to reflect the increase to pro forma Salaries and Wages - Employees expense.

Pro Forma Wage Adjustment	\$ 12,193
Times: 7.65 Percent FICA Rate	<u>7.65%</u>
Increase in FICA	\$ 933

(K) Losses on Disposition of Property. During the test year, North McLean District wrote off obsolete office equipment. The difference between the book value and the accumulated depreciation for the office equipment is \$243. Losses from the disposal of property is not a routine transaction in the normal course of business and, therefore, should be removed from the test year. Staff recommends an adjustment to Losses on the Disposition of Property of \$243 to remove the effects of this extraordinary item. In

addition, the depreciation expense of the office equipment needs to be removed from the depreciation account. Therefore, Staff also recommends decreasing the depreciation account by the same amount.

OVERALL REVENUE REQUIREMENT AND REQUIRED REVENUE INCREASE

By applying the Operating Ratio Method, as generally accepted by the Commission, Staff found North McLean District's Revenue Requirement from Rates for Service to be \$954,148. A revenue increase of \$117,761 or 14.08 percent is necessary to generate the Overall Revenue Requirement.

The operating ratio methodology¹⁷ is used when there is no basis for a rate of return determination, the cost of the utility has fully or largely been funded through contributions, or there is little or no outstanding long-term debt. Staff is of the opinion that an operating ratio of 88 percent will allow North McLean District sufficient revenues to cover its reasonable operating expenses and provide for reasonable equity growth. Therefore, Staff finds the Operating Ratio Method is more appropriate as North McLean District has only one outstanding debt.

¹⁷ Operating Ratio is defined as the ratio of expenses, including depreciation and taxes, to gross revenues. It is illustrated by the following equation:

$$\text{Operating Ratio} = \frac{\text{Operating Expenses} + \text{Depreciation} + \text{Taxes}}{\text{Gross Revenues}}$$

	North McLean District	Staff
Pro Forma Operating Expenses Before Income Taxes	\$ 784,387	\$ 864,807
Divided by: Operating Ratio	<u>0.88</u>	<u>0.88</u>
Sub-Total	891,349	982,735
Less: Pro Forma Operating Expenses Before Income Taxes	<u>(784,387)</u>	<u>(864,807)</u>
Net Income Allowable	106,962	117,928
Add: Interest Expense	2,126	218
Pro Forma Operating Expenses Before Taxes	<u>784,387</u>	<u>864,807</u>
Total Revenue Requirement	893,475	982,954
Less: Other Operating Revenue	(30,244)	(22,099)
Non-operating Revenue	0	0
Interest Income	<u>(6,707)</u>	<u>(6,707)</u>
Total Revenue Required from Rates for Service	856,524	954,148
Less: Revenue from Sales at Present Rates	<u>(762,288)</u>	<u>(836,387)</u>
Required Revenue Increase	\$ 94,236	\$ 117,761
Percentage Increase	<u>12.36%</u>	<u>14.08%</u>

1. Interest Expense. In its application, North McLean District stated interest expense to be \$2,126.¹⁸ However, since North McLean District has already made the interest payments on its long-term debts for 2020, those payments have been recovered through North McLean District's existing rates. Therefore, only debt service payments that will be made after new rates are placed into effect should be considered in determining North McLean District's interest expense. At the time of Staff's review, North McLean District had one outstanding loan payable to the Independence Bank of Kentucky.¹⁹ Staff determined that the five-year average, for the years 2021 through 2025, for interest expense would be \$218 as shown below.

¹⁸ Application, Attachment 5.

¹⁹ *Id.*, Attachment 7.

2021-2025 Five-Year Average of Debt Payments			
Year	45156-10		Annual Debt
2021	\$	787	\$ 787
2022		303	303
Totals		1,090	1,090
Divide by: 5 years			5
Average Annual Interest Payment			<u>\$ 218</u>

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Signatures

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APPENDIX

APPENDIX TO A STAFF REPORT OF THE KENTUCKY PUBLIC SERVICE
COMMISSION IN CASE NO. 2020-00238 DATED NOV 17 2020

Monthly Water Rates

First	2,000	Gallons	\$22.43	Minimum bill
Next	8,000	Gallons	0.00834	per 1,000 Gallons
Next	30,000	Gallons	0.00763	per 1,000 Gallons
Over	40,000	Gallons	0.00696	per 1,000 Gallons

Non-Recurring Charges

Service Call	\$8.64
Service Call (After Hours)	\$48.42
Disconnect Fee	\$17.25
Disconnect Fee (After Hours)	\$54.06
Reconnect Fee	\$17.25
Reconnect Fee (After Hours)	\$54.06
Cut-Lock Charge	\$48.63

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